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April 26, 2007

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BY HAND DELIVERY

Hon. Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street, Room 660
New York, New York 10007

Re: Musket Corp. v. PDVSA Petroleo, S.A., et ano.
06 CV 15522 (VM)

Request GRANTED . The time for <u>plaintiff</u> to <u>complete service of</u> the complaint in this action is extended to <u>6-29-07</u> .	
SO ORDERED.	
<u>4-27-07</u> DATE	 VICTOR MARRERO, U.S.D.J.

Dear Judge Marrero:

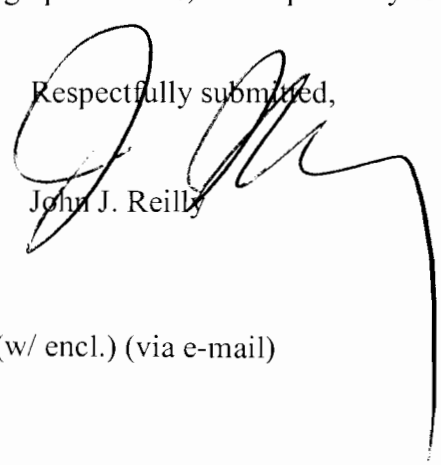
We represent plaintiff Musket Corporation. By motion dated February 26, 2007 (the "Motion"), we moved for an Order, pursuant to Rule 64 and CPLR 6213, to extend the time to serve the Summons and Complaint upon defendant PDVSA Petroleo, S.A. (For the Court's convenience, a copy of our original Motion is enclosed.) PDVSA is a Venezuelan corporation based in Caracas. We initiated service via the Hague Convention prior to making the Motion.

Your Honor granted the Motion by endorsed Order dated February 27, 2007 (copy enclosed). As set forth in the Order, Your Honor granted leave to seek further extensions of time to complete service upon PDVSA in order to facilitate Musket's compliance with CPLR 6213, which provides, in relevant part, that "[a]n order of attachment granted before service is made on the defendant against whom the attachment is granted is valid only if, within sixty days after the order is granted, a summons is served upon the defendant."

Given the foregoing, we hereby seek an additional sixty days to serve PDVSA in accordance with your Order. Counsel for PDVSA has advised that, according to their client, service of process through official channels in Venezuela is in process and may be completed within a matter of days. Counsel for PDVSA has accordingly consented to our application, but only to the extent of a two-week extension, but will consent to more time if service is not completed in two weeks.

Given the vagaries of these unknown foreign procedures, we respectfully request that the Court grant the full sixty-day extension.

Respectfully submitted,


John J. Reilly

Enclosures

cc: Bernard V. Preziosi Jr., Esq. (w/ encl.)
Lizabeth L. Burrell, Esq. (w/ encl.)
Advanced Engineering Development Ltd. (w/ encl.) (via e-mail)

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